

## Section 3: Hazardous Waste

### This Section will:

- Identify what types of wastes you generate and whether they are defined as hazardous;
- Measure the amount of hazardous waste your shop generates and accumulates; and
- Determine your hazardous waste “generator status,” as a Conditionally Exempt Small Quantity Generator (CESQG), a Small Quantity Generator (SQG), a Large Quantity Generator (LQG), or not a generator of hazardous waste. Your status determines the requirements you have to meet in managing your hazardous waste.

### 3.1 Hazardous Waste Determination

Do you generate hazardous waste? You may without knowing it. Parts cleaning, painting, and other activities in your shop can produce wastes that are legally defined and regulated as “hazardous waste” under state and federal law. For example, common hazardous wastes in auto body shops include waste paint, sludge (or “bottoms”) from solvent recycling stills, or spent solvent. Some raw materials, such as paints, that have expired, or that you do not intend to use may also become classified as hazardous wastes.

If you have batteries; mercury thermostats; mercury-containing UV and fluorescent light bulbs; or pesticides at your shop, you may handle and dispose of these items as Universal Waste, as specified in Section 4. If you do not handle these items as Universal Waste, you must handle them as hazardous waste; count them in your poundage totals for hazardous waste, and dispose of them as hazardous waste.

Under Virginia and federal law, if you generate hazardous waste you have “cradle-to-grave liability,” which means you are responsible for your waste even if other companies handle and dispose of it for you. You must determine whether your shop’s wastes are classified as hazardous waste and take responsibility for handling and disposing of your wastes properly according to the law.

**When you are finished reading this section, you should be able to answer the following questions on the Self-Certification Checklist:**

<p>Self-Certification Package</p> <p>Checklist Section 3 Hazardous Waste</p>	<p>Use the Appendix 2 and 3 to help you questions 3.1 and 3.2.</p> <p>3.1 Does your shop generate any hazardous wastes?</p> <p>3.2 Has your shop determined if the wastes generated are regulated hazardous wastes? You can make the determination using your knowledge, or by reviewing MSDS, or other technical specification data sheet provided by your vendor.</p> <p>3.3 Has your shop tested potentially hazardous wastes for which a “knowledge-based” determination cannot be made?</p>
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3.4 Does your shop track hazardous waste accumulation totals?	Self-Certification Package  Checklist Section 3 Hazardous Waste
3.7 What is your hazardous waste generator status?	
Are you meeting all the requirements for your generator status?	

### 3.1.1 How can you tell if your wastes are hazardous?



You are required to find out if any of the wastes your shop generates are considered hazardous. They are considered hazardous if:

- They are ignitable, corrosive, reactive, or toxic. These are classified as “characteristic hazardous waste;” or
- They are a “listed hazardous waste” as listed by the U.S. Environmental Protection Agency; or
- They are a “mixture of a solid waste and a hazardous waste” that are listed wastes, or characteristic wastes. Some examples are: cleaning rags that are wet with toxic solvents, still bottoms from solvent recycling, kitty litter used to clean up a hazardous waste spill, and dirt that has been contaminated with hazardous waste.

This section will help you complete the Hazardous Waste Identification Worksheet found in Appendix 3. We will walk you through a step-by-step process of identifying what wastes your shop generates and which of those are “hazardous waste.”

The worksheet lists all of the common wastes from auto body shops that are or might be considered hazardous waste. When you have finished this section, you should have a list of all of the hazardous wastes you generate and the amount of each one that you generate. With this information in hand, you can turn to Section 3.1.2 to determine your hazardous waste generator status.

### Completing the Hazardous Waste Identification Worksheet

1. Review the “Hazardous Waste Identification Assistance Table,” Appendix 2.
2. Put a check in Column 3 for each type of waste that your shop has generated in the previous 12 months.
3. If you only checked off wastes in rows 1-18, go to Step 10. The wastes listed in rows 1-18 are always hazardous.
4. If you checked off wastes listed in rows 19-34, you are generating potentially hazardous wastes, and have to fill out Columns 4 and 5. You need to determine whether your wastes are, in fact, hazardous. You need explain how you made that determination. You can determine whether your wastes are hazardous through your knowledge of process and materials, by reviewing Materials Safety Data Sheets (MSDS), or by testing a representative waste sample. You may want to use the Hazardous Waste Identification Assis-

tance Table (Appendix 2) to help determine whether the generated wastes are hazardous.

5. If you determined that the waste is hazardous, write YES in Column 4. Then go to Step 6.
6. If you determined the waste is not hazardous, write NO in Column 4. Then go to Step 6.
7. If you determine the waste as hazardous by using your knowledge of process and materials, write 1 in Column 5. Then go to Step 10.
8. If you determine the waste as hazardous by reviewing the MSDS or the product label for ingredients and for warning of dangerous characteristics (e.g., ignitability, corrosivity, reactivity, and toxicity), write 2 in Column 5. Then go to Step 10.
9. If you determine the waste as hazardous by testing a representative sample of the waste, write 3 in Column 5. You can use a TCLP test (Toxicity Characteristic Leaching Procedure). Then go to Step 10. If more information, visit "EPA TCLP Questions" at [www.epa.gov/SW-846/faqs\\_tclp.htm](http://www.epa.gov/SW-846/faqs_tclp.htm).
10. If you determine the waste as hazardous using other methods, such as consulting your hazardous waste management vendors, or asking DEQ, write 4 in Column 5. Then go to Step 10.
11. In Column 6, enter the maximum amount you have generated in any single month within the past 12 months.

The maximum monthly amount should reflect the amount of hazardous waste you generate in peak months. If the number of cars your shop repairs is about the same every month, you can enter the amount of waste you generated last month.

If necessary, convert gallons to pounds by multiplying the number by 8.5\* for liquid wastes including the weight of the container. For solid wastes, weigh the wastes including the container.

12. In Column 7, enter the total amount of hazardous waste accumulated on your property.

The total weight (including the container) of the shipment of hazardous waste listed on the manifest/bill of lading will determine your classification. Please call DEQ's Northern Regional Office at (703) 583-3813, if you have any questions.

If necessary, convert gallons to pounds by multiplying the number by 8.5\* for liquid wastes including the weight of the container. For solid wastes, weigh the wastes including the container.

*\* Please note that the conversion factor of 8.5 is only an estimate for liquid wastes provided for the convenience of most shops, and may not be pre-*

*cise enough for your particular shop to determine its generator status. If you are close to the threshold level for any generator status, you will need to use more exact numbers to convert gallons into pounds. Contact your supplier.*

13. Add the maximum monthly amounts generated and accumulated for all of your hazardous wastes in pounds, and enter the total at the bottom of the worksheet (in row 30). If you have not converted amounts into pounds, do so now before you add up the total amount. You will use your total amount generated and total amount accumulated figures, to determine your generator status (Section 3.1.2).

Remember, changes in the materials you use or your shop's procedures may change your waste. If your materials change, re-evaluate your waste by using the Hazardous Waste Identification Worksheet. This will help make sure that you have correctly determined your shop's generator status.

### **3.1.2 Determining your generator status**

After you have completed the Hazardous Waste Identification Worksheet, you will know the **total maximum monthly amount of each hazardous waste you generate** and the **total amount accumulated in your shop for each waste**. These two totals are key factors in determining your hazardous waste generator status.

The final consideration in determining your generator status is the amount of **acute** hazardous waste you have accumulated on site. **Most auto body shops do not have acute hazardous waste. If you handle solvents with carbon disulfide or pyridine, call the DEQ's Northern Regional Office at (703) 583-3813 to see if you might be generating acute hazardous waste.**

The following table summarizes the various limits for each of the three categories of hazardous generators:

	<b>CESQ</b> Conditionally Exempted Small Quantity Generators	<b>SQG</b> Small Quantity Generators	<b>LQG</b> Large Quantity Generators	Self-Certification Package  Checklist Section 3 Hazardous Waste  Question 3.7
Maximum Amount of Hazardous Waste Generated in any calendar month	Less than 25 gal (220 lbs)	25-300 gal (220-2,200 lbs)	More than 300 gal (More than 2,200 lbs)	
Amount of Hazardous Waste Accumulated at any one time	Less than 300 gal (Less than 2,200 lbs)	Less than 1,595 gal (Less than 13,000 lbs)	No Limit	
Amount of Acute Hazard- ous Waste Accumulated in any calendar year, or at one time	Less than 1 kg (2.2 pounds)	Less than 1 kg (2.2 pounds)	More than 1 kg (2.2 pounds)	

**What to do next:**

- **Conditionally Exempt Small Quantity Generator (CESQG)**  
Use Section 3.2 to help you fill out the Auto Body Self-Certification Checklist. Then skip to Section 3.4 and continue reading.
- **Small Quantity Generator (SQG)**  
Use Section 3.3 to help you fill out the Auto Body Self-Certification Checklist. Then continue reading Section 3.4.
- **Large Quantity Generator (LQG)**  
Please contact DEQ's Northern Virginia Regional Office at (703) 583-3813 before continuing. This workbook is not intended for LQGs. The Northern Virginia Regional Office will provide you with appropriate information and assistance.
- **If you do not generate any hazardous waste**, skip to Section 3.4.

## **3.2 Hazardous Waste Management for CESQGs, Conditionally Exempt Small Quantity Generators**

This section provides you with information on what you must do to comply with the regulations for managing hazardous waste at CESQG shops. The sections also recommends "best practices" for managing hazardous waste.

**When you are finished reading this section, you should be able to answer the following questions on the Self-Certification Checklist:**

Self-Certification Package  Checklist Section 3 Hazardous Waste	<p>3.9 Does your shop send all hazardous wastes to a permitted hazardous waste treatment, storage, or disposal facility or a state authorized facility?</p> <p>3.11 Does your shop maintain required records for hazardous waste shipment for at least 3 years?</p> <p>3.12 Are all hazardous waste containers properly labeled?</p> <p>3.16 Are all containers holding hazardous waste managed to prevent, or to minimize accidental releases?</p> <p>3.26 Is the accumulation area inspected weekly for signs of spills, or container deterioration?</p> <p>3.43 Does your shop have a program that trains employees who handle hazardous waste in proper waste management procedures?</p>
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### **3.2.1 Labeling containers**

Containers holding hazardous waste must be appropriately labeled. This section will help you comply with labeling requirements.

## **Requirements for Labeling Containers**

- Always label all containers and tanks holding hazardous waste with the words “HAZARDOUS WASTE.”
- Hazardous waste containers in satellite accumulation areas should also be labeled either with the words “HAZARDOUS WASTE,” or with other words that say what is in the container. A satellite accumulation area simply means a place where you store waste as you work, before you move the waste to a central location in your shop.



## **Good Ideas for Labeling Containers**

- In addition to labeling containers with the words “HAZARDOUS WASTE,” list the specific contents of each container, such as “WASTE PAINT SOLVENT,” on the label.
- Mark each container with the date that you started storing hazardous waste in that container and the date the container became full.
- Store each kind of waste in a different container. This will help you avoid putting incompatible wastes in the same container.

## **3.2.2 Managing containers to prevent releases**

Hazardous wastes must be stored in appropriate containers and handled carefully. This section will help you manage and handle your hazardous waste containers to prevent leaks, spills, and explosions.

### **Requirements for Managing Containers to Prevent Releases**

You must manage hazardous waste containers to prevent wastes from leaking, spilling, or exploding.

- Always keep container lids and bung holes closed, except when you are filling or emptying the container. If you have hazardous waste tanks, always keep their lids closed.
- Keep your storage containers in good shape, with no leaks, corrosion, rust, or bulges. If a container is not in good condition or is leaking, transfer the hazardous waste into a container that is in good condition.
- Open, handle and store hazardous waste containers carefully to prevent the waste from leaking or spilling. Protect them from moving vehicles.
- Store wastes in containers that are compatible with the waste, or use containers with compatible liners, so the wastes will not dissolve, corrode, or react with the container. Steel drums approved by the US Department of Transportation (USDOT) should be used for all paints, thinners, gun cleaners, and paint strippers. Acid wastes should be stored in USDOT approved plastic containers, not metal drums.





- Separate containers holding wastes that could react with each other.
- Store rags and any other materials that may have touched solvents or paint strippers in closed, airtight containers. Leaving dirty, solvent-soaked rags lying around can cause a fire or explosion if fumes from the rags come in contact with a spark.

In addition to the requirements above, the Best Management Practices (BMPs) on the following page are good ideas to help prevent hazardous wastes from leaking, spilling, or exploding.

### **Good Ideas for Managing Containers to Prevent Releases**

- Separate containers by distance or a physical barrier (like a dike, berm, or wall).
- Store only one type of hazardous waste in one container. Mixing wastes can cause dangerous reactions. Mixed wastes can be more expensive and difficult to dispose of.
- Store all containers far enough apart so they can be inspected thoroughly.
- Store containers indoors, protected from the weather.
- Store containers on a surface that will prevent and contain spills and leaks, such as a small concrete pad with a berm, or a commercially available containment pallet or tray.
- Properly dispose of hazardous waste containers.
- Use a ground strap on metal drums to avoid sparks from static electricity.
- **Don't** let rainwater accumulate on and around drums.
- **Don't** allow smoking near hazardous wastes.

### **3.2.3 Accumulating and storing hazardous waste**

As a CESQG, you may store a limited amount of hazardous waste at your shop. This section will help you understand requirements for hazardous waste accumulation and storage.

You should have a centralized place for storing hazardous waste in your shop that is secure and protected from the weather. If you generate small amounts of hazardous waste throughout your shop, you may store these wastes close to where you generated the waste, in what are called “satellite accumulation areas.” A satellite accumulation area simply means a place where you store waste as you work, before you move the waste to a central location in your shop.

## Requirements for Accumulating and Storing Hazardous Waste

- To maintain your CESQG status, you must stay within the quantity storage limits (found on page 3-4).
- **Don't** accumulate more than 300 gallons (2,200 pounds) of hazardous waste on your property. If you store more than this amount, your generator status will change, and you will have to comply with additional requirements.



In addition to the above requirement, the Best Management Practices (BMPs) on the following page are good ideas for storing hazardous waste to help prevent leaks, spills, or explosions. Points listed below in bold are on the certification checklist.

### Good Ideas for Storing Hazardous Waste to Prevent Leaks, Spills, or Explosions

- **Inspect the accumulation area weekly for signs of spills, container deterioration or improperly sealed containers.** DEQ suggests that you post the inspection checklist in the accumulation area where it is visible.

See Appendix 4 for an example Inspection Checklist.

- Maintain inspections records of the accumulation area(s) for 3 years.
- Label each container with the date that the waste is first put in, and when the container is full
- If your shop has a satellite accumulation area:
  - **Mark the Satellite Accumulation Area by signs, floor markings, etc.**
  - Keep each satellite accumulation container closed.
  - Keep all satellite accumulation containers in good condition.
  - Store less than 55 gallons of hazardous waste at each satellite accumulation area.
  - Once you reach the 55-gallon limit, transfer the waste to your central storage place for hazardous waste containers.
- Submit information on the shop and its waste accumulation areas to local police, fire departments, local emergency planning committee and hospitals.

See Appendix 6 for a Sample Letter to Local Authorities.
- **Don't** ship containers before they are full.

### 3.2.4 Shipping your waste

For proper disposal, all of your hazardous waste must be transported by a permitted hazardous waste hauler to a permitted hazardous waste recycling, treatment, storage or disposal facility. You must keep required records. This section will help you comply with regulations for shipment of your hazardous waste.



## Requirements for Shipping Your Waste



- Ship your hazardous waste to a permitted hazardous waste recycling, treatment, storage or disposal facility.
- Only use a hauler with a Virginia Hazardous Waste Transporter Permit to transport your hazardous waste.
- Keep records of how you disposed of your hazardous waste for at least 3 years. Adequate records include hazardous waste manifests or other documentation, such as bill of lading, receipts, tolling agreements, or letters of acceptance. The documentation should describe the waste and how much was disposed, where it was sent for disposal, and the date of disposal.
- **Don't** dispose of your hazardous waste in a solid waste landfill, municipal waste incinerator, or in a trash receptacle.
- **Don't** dispose of your hazardous waste at your shop. Don't flush hazardous waste down the drain, or pour it into a storm drain, stream, or on the ground. Don't burn hazardous waste, or allow it to evaporate into the air.
- **Don't** transport your own hazardous waste to another location.

In addition to the requirements above, the following Best Management Practices (BMPs) are good ideas for shipping hazardous wastes.

### Good Ideas for Shipping Hazardous Wastes

- If your hazardous waste is recycled, and if you and your licensed hazardous waste recycler have a reclamation agreement, keep a copy of the agreement in your records.
- Check with business colleagues or industry trade associations to help you choose an appropriate hauler or recycling, treatment, or disposal facility to handle your waste. You can also contact the DEQ's Bob Wickline for suggestions, at (804) 698-4213.



### 3.2.5 Planning for emergencies

Maintain safety and emergency equipment, and have a plan for what to do in case of an emergency, to reduce the impact of a spill, fire, or explosion. **There are no emergency preparedness requirements for CESQGs.** However, the following Best Management Practices (BMPs) are good ideas to help you plan and prepare for any emergencies at your shop.

### Good Ideas for Emergency Preparation

- Keep the following equipment to help your shop be prepared for an emergency:
  - an internal communication system (such as an alarm or intercom);
  - a telephone to call for help;

- fire extinguishers,
- materials to control a hazardous waste spill (such as spill absorbents, overpack drums, and extra 55-gallon drums); and
- decontamination supplies (such as neutralizing agents like lime).
- Maintain a list of emergency phone numbers at each telephone.
- Maintain a central list of the locations of all fire extinguishers, along with fire extinguisher location wall diagram. Conduct annual fire equipment inspections as required by OSHA, your liability insurance carrier, and your local fire marshal.
- Maintain spill control materials.
- Maintain any installed fire alarm systems.

See Appendix 7 for a sample Emergency List you can use in your shop.

- Keep enough aisle space in all work areas to allow people to get out in case of an emergency.
- Do not block emergency or safety equipment.
- Develop a written emergency preparedness and emergency response plan.

See Appendices 8 and 9 for Sample Emergency Preparedness Tools and an Emergency Response Plan.

- Inform your local fire marshal about the types of hazardous waste you handle at your shop. This way, if an emergency occurs, they will be prepared to respond.

See Appendix 6 for a Sample Letter to Local Authorities.

- Teach your employees about the emergency plan during their hazardous waste training.

### **3.2.6 Training your employees**

Training your employees on the proper handling of hazardous waste will help avoid spills, fire, and explosions. **Training for employees who handle hazardous waste is not required for CESQGs.** However, using the following Best Management Practices (BMPs) to design hazardous waste training for your employees can help prevent release of hazardous wastes.

#### **Good Ideas for Training Your Employees**

- Train your shop's staff to identify hazardous waste.
- Train your shop's staff to inspect and handle hazardous wastes.
- Train your shop's staff to follow Emergency Response Procedures.
- Consider using the training requirements found in Section 3.3.6.
- Include training on pollution prevention. After being trained, your employees should know how to reduce the amount of hazardous waste .

- Provide training to all new employees within six months of hiring them. You should also provide refresher training every year.
- Keep a record of your hazardous waste training for 3 years. You should record:
  - The dates and times of the training;
  - What topics the training covered;
  - Who attended the training, and
  - Who provided the training.

You have completed reading the section for Conditionally Exempt Small Quantity Generators, which you determined as generator status for your shop. Please skip Section 3.3, and continue reading Section 3.4 on page 3.18.

### 3.3 Hazardous Waste Management for SQGs, Small Quantity Generators

This section contains information on the requirements and best practices for managing hazardous waste at an SQG shop.

**When you are finished reading this section, you should be able to answer the following questions on the Self-Certification Checklist:**

<p>Self-Certification Package</p> <p>Checklist Section 3 Hazardous Waste</p>	<p>3.9 Does your shop send all hazardous wastes to a permitted hazardous waste treatment, storage, or disposal facility or a state authorized facility?</p> <p>3.11 Does your shop maintain required records for hazardous waste shipment for at least 3 years?</p> <p>3.12 Are all hazardous waste containers properly labeled?</p> <p>3.16 Are all containers holding hazardous waste managed to prevent, or to minimize accidental releases?</p> <p>3.26 Is the accumulation area inspected weekly for signs of spills, or container deterioration?</p> <p>3.43 Does your shop have a program that trains employees who handle hazardous waste in proper waste management procedures?</p>
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#### 3.3.1 Labeling containers

Containers holding hazardous waste must be appropriately labeled. This section will help you comply with hazardous waste container labeling requirements.

## Requirements for Labeling Containers

- Always label all containers and tanks holding hazardous waste with the words “HAZARDOUS WASTE.”
- Hazardous waste containers in satellite accumulation areas should also be labeled either with the words “HAZARDOUS WASTE,” or with other words that say what is in the container. A satellite accumulation area simply means a place where you store waste as you work, before you move the waste to a central location in your shop.
- List on the label exactly what is stored in the container.
- Date each container label.
  - If the storage container is in your central hazardous waste storage area, record the date that you started storing hazardous waste in the container.
  - If the container(s) is in the satellite accumulation area, you can accumulate up to 55 gallons of any one waste. When you have filled a container, record the date and move it to central storage area.



### 3.3.2 Managing containers to prevent releases

Hazardous wastes must be stored in appropriate containers and handled carefully. This section will help you manage and handle your hazardous waste containers to prevent leaks, spills, and explosions.

#### Requirements for Managing Containers to Prevent Releases

You must manage hazardous waste containers to prevent wastes from leaking, spilling, or exploding.

- Always keep container lids and bung holes closed, except when you are filling or emptying the container. If you have hazardous waste tanks, always keep their lids closed.
- Keep your storage containers in good shape, with no leaks, corrosion, rust, or bulges. If a container is not in good condition or is leaking, transfer the hazardous waste into a container that is in good condition.
- Open, handle and store hazardous waste containers carefully to prevent the waste from leaking or spilling. Protect them from moving vehicles.
- Store wastes in containers that are compatible with the waste, or use containers with compatible liners, so the wastes will not dissolve, corrode, or react with the container. Steel drums approved by the US Department of Transportation (USDOT) should be used for all paints, thinners, gun cleaners, and paint strippers. Acid wastes should be stored in USDOT approved plastic containers, not metal drums.





- Separate containers by distance or a physical barrier (like a dike, berm, or wall).
- Separate containers holding wastes that could react with each other.
- Store rags and any other materials that may have touched solvents or paint strippers in closed, airtight containers. Leaving dirty, solvent-soaked rags lying around can cause a fire or explosion if fumes from the rags come in contact with a spark.

In addition to the requirements above, the following Best Management Practices (BMPs) are good ideas to help prevent hazardous wastes from leaking, spilling, or exploding.

### **Good Ideas for Managing Containers to Prevent Releases**

- Store only one type of hazardous waste in one container. Mixing wastes can cause dangerous reactions. Mixed wastes can be more expensive and difficult to dispose of.
- Store containers on a surface that will prevent and contain spills and leaks, such as a small concrete pad with a berm, or a commercially available containment pallet or tray.
- Store containers indoors, protected from the weather.
- Keep containers with ignitable or flammable hazardous waste at least 50 feet inside your property line. Post large “No Smoking” signs near the containers.
- Properly dispose of hazardous waste containers.
- Use a ground strap on metal drums to avoid sparks from static electricity.
- **Don’t** let your containers leak, rust, or get damaged.
- **Don’t** let rainwater accumulate on and around drums.
- **Don’t** allow smoking near hazardous wastes.

### **3.3.3 Accumulating and storing hazardous waste**

You may only store a limited amount of hazardous waste at your shop, for a limited amount of time. This section will help you understand requirements for hazardous waste accumulation and storage.

If you generate small amounts of hazardous waste throughout your shop, you may store these wastes close to where you generated the waste, in what are called “satellite accumulation areas.” A satellite accumulation area simply means a place where you store waste as you work, before you move the waste to a central location in your shop.

## Requirements for Accumulating and Storing Hazardous Waste

You must inspect hazardous waste storage areas regularly, store hazardous wastes carefully, and keep within the limits for the amount of waste you can legally store.

- Inspect the accumulation area weekly for signs of spills, container deterioration or improperly sealed containers.  
See Appendix 4 for a sample Inspection Checklist you can use at your shop. Suggestion — post an inspection checklist in the accumulation area where it is visible.
- Keep written records of the hazardous waste accumulation area inspections for 3 years.
- If the storage area contains ignitable or reactive wastes, protect them from materials or conditions such as sparks or heat that could cause them to catch fire or explode.
- Submit information on the shop and its waste accumulation areas to local police, fire departments, and hospitals.  
See Appendix 6 for a sample Letter to Local Authorities.
- If your shop has a satellite accumulation area:
  - Maintain all satellite accumulation containers under control of the operator and at or near the point of generation;
  - Keep the satellite accumulation container(s) closed;
  - Keep the satellite accumulation container(s) in good condition.
- **Don't** accumulate more than 1,595 gallons (about 29 drums) or 13,000 pounds of hazardous waste at your shop at one time.
- **Don't** store hazardous waste at your shop for more than 180 days. If you must ship waste more than 200 miles away for disposal, do not store the waste at your site for more than 270 days.
- **Don't** accumulate more than 55 gallons of hazardous waste at each satellite accumulation area.



In addition to the requirements, the following Best Management Practices (BMPs) are good ideas for storing hazardous waste to help prevent leaks, spills, or explosions.

## Good Ideas for Accumulating and Storing Hazardous Waste

- Use secondary containment at the hazardous waste storage area. Secondary containment means tools such as dikes, berms, retaining walls, curbing, or other systems that will hold hazardous wastes in case your primary hazardous waste containers leak.

### 3.3.4 Shipping your waste

All of your hazardous waste must be transported by a permitted hazardous waste hauler to a permitted hazardous waste recycling, treatment, storage or disposal facility. You must keep required records. This section will help you comply with regulations for shipment of your hazardous waste.

#### Requirements for Shipping Your Waste

You must send all hazardous wastes to a permitted hazardous waste treatment, storage, or disposal facility, and keep all required records.

- Ship your hazardous waste to a permitted hazardous waste recycling, treatment, storage or disposal facility.
- Only use a hauler with a Virginia Hazardous Waste Transporter Permit to transport your hazardous waste.
- Prepare a hazardous waste manifest for all hazardous waste that is shipped off-site by a permitted hazardous waste transporter. Fill in all parts of the manifest. Keep returned copies of hazardous waste manifests with the signature of the person who accepted the waste at the recycling, treatment or disposal facility. This returned copy of the manifest shows that your hazardous waste was properly delivered.  
Suggestion- attach a copy of the original manifest to the returned signed copy together with the Land Disposal Restriction Form (Appendix 10).
- Keep the hazardous waste manifest for at least 3 years.  
See Appendix 5 for a sample Uniform Hazardous Waste Manifest.
- **Don't** dispose of your hazardous waste in a solid waste landfill, municipal waste incinerator, or in a trash receptacle.
- **Don't** dispose of your hazardous waste at your shop. Don't flush hazardous waste down the drain, or pour it into a storm drain, stream, or on the ground. Don't burn hazardous waste, or allow it to evaporate into the air.
- **Don't** transport your own hazardous waste to another location.



In addition to the requirements, the following Best Management Practices (BMPs) are good ideas for shipping hazardous wastes.

#### Good Ideas for Shipping Your Waste

- If your hazardous waste is recycled, and if you and your licensed hazardous waste recycler have a reclamation agreement, keep a copy of the agreement in your records.
- Check with business colleagues or industry trade associations to help you

choose an appropriate hauler or recycling, treatment, or disposal facility to handle your waste. You can also contact the DEQ's Bob Wickline for suggestions, at (804) 698-4213.



### **3.3.5 Planning for emergencies**

Maintaining safety and emergency equipment and plans at your shop can greatly reduce the impact if a spill or explosion does happen at your shop. This section will help you prepare for emergencies that could occur in your shop.

#### **Requirements for Planning for Emergencies**

You must plan and prepare for hazardous waste emergencies.

- Have a telephone to call for help.
- Have fire-extinguishing equipment, identify the locations and have inspected annually.
- Test fire-extinguishing equipment.
- Maintain an internal communication system (such as an alarm system or intercom) if your accumulation area is remote.
- Make sure that aisle space allows unobstructed movement of personnel and emergency equipment.
- Post a list next to the main telephone or radio with the phone number for the fire department, location of your emergency equipment, and the phone number of at least one person who is on standby and will coordinate emergency response.

See Appendix 7 for a sample Emergency List you can use in your shop.



In addition to the requirements, the following Best Management Practices are good ideas to help you plan and prepare for any emergencies at your shop.

#### **Good Ideas for Planning for Emergencies**

- Keep the following equipment to help your shop be prepared for an emergency:
  - An internal communication or alarm system to immediately alert all employees if an emergency occurs (for example, a fire alarm or an intercom system);
  - Materials to control a hazardous waste spill (such as spill absorbents, overpack drums, and extra 55-gallon drums); and
  - Decontamination supplies (such as neutralizing agents like lime).



- Develop a written plan for how to prevent and respond to emergencies that includes:
  - How you will maintain and operate your shop to minimize the possibility of fire, explosion or any other unplanned release of hazardous waste;
  - The name and contact information for the emergency coordinator responsible for responding to accidents;
  - Fire, spill, and explosion response procedures;
  - What emergency equipment is in place at your shop; and
  - Evacuation plan, signals and routes.
 See Appendices 8 and 9 for a sample Emergency Preparedness Tool and Emergency Plan of the type you should create for your shop.
- Inform your local fire marshal about the types of hazardous waste you handle at your shop. This way, if an emergency occurs, they will be prepared to respond.  
See Appendix 6 for a Sample Letter to Local Authorities.
- Teach your employees about the emergency plan during their hazardous waste training.

### **3.3.6 Training your employees**

Training your employees on the proper handling of hazardous waste will help avoid spills or explosions. This section will help you think about training for your employees that handle hazardous waste.

#### **Requirement; for Training Your Employees**

You must provide training for employees who handle hazardous waste in proper waste management procedures. Employees should know where the Material Safety Data Sheets (MSDS) are kept and understand:

- What a hazardous waste is, and which wastes are hazardous at your shop. Employees should be able to tell when a new product or waste might be hazardous. They should also know how to read and use the MSDS and understand warning labels on hazardous products. They should know where MSDS are filed.
- How to properly store and accumulate wastes to prevent and to minimize accidental releases. After being trained, your employees should be able to:
  - Avoid spills (by using funnels, drip pans, and absorbent materials);
  - Use equipment to protect themselves (such as gloves, eye protection, and respirators);
  - Keep hazardous wastes separate from one another and from other materials;
  - Store materials and wastes correctly; and
  - Avoid improper disposal of waste.



- How to properly label containers with the words “HAZARDOUS WASTE” and the date when materials were first put in the empty container.
- How to follow Emergency Response Procedures, including how to:
  - Respond to spills or other accidents;
  - Respond to communications and alarm systems;
  - Contact emergency responders (fire, police, and ambulance);
  - Find emergency equipment;
  - Extinguish a small fire, when to try to do so, and the proper equipment to use for extinguishing each particular type of fire;
  - Contain and clean up a waste spill; and
  - Use evacuation plans and routes.
- How to maintain required hazardous waste records.

You must keep records indicating that an employees’ training program is occurring.



In addition to the above requirements, the following Best Management Practices (BMPs) are good ideas for your employee-training program.

### **Good Ideas for Training Your Employees**

- Include training on pollution prevention. After being trained, your employees should know how to reduce the amount of hazardous waste they generate by carefully managing inventories, substituting less toxic materials where possible, and recovering and recycling waste.
- Provide training to all new employees within six months of hiring them. You should provide refresher training every year.
- Keep a record of your hazardous waste training for 3 years. You should record:
  - The dates and times of the training;
  - What topics the training covered;
  - Who attended the training; and,
  - Who provided the training.

### **3.4 Preventing Pollution from Hazardous Waste**

As discussed in Section 1 Best Practices for Auto Body Shops, pollution prevention means reducing waste through efficient use of energy, raw materials, and water. Auto body shops that prevent pollution help the environment and can often cut costs and increase profits.

Reducing waste can also help reduce regulatory requirements. For example, if you are a Small Quantity Generator of hazardous waste, reducing your waste could help you become a Conditionally Exempt Small Quantity Generator with fewer requirements for hazardous waste.

**When you are finished reading this section, you should be able to answer questions 3.47-3.53 on the Self-Certification Checklist:**

Please consider implementing the following good ideas to prevent pollution from your shop. Note the ideas listed below are in the certification checklist.

- Pre-clean parts with mechanical techniques (like a squeegee, a rag or a wire brush) to reduce the use of solvents.
- Use a solvent recycler to recycle thinners, gun cleaners, or other solvents.
- Keep spill-absorbent material available for cleaning spills.
- Store partially used absorbents in closed, labeled containers, right next to the containers for new absorbents. Reuse partially used absorbents instead of throwing them away.
- Keep liquids covered (required) and in cool places to reduce evaporation. For example, covering a parts washer can reduce evaporation and make your solvent last longer.



Contact Sharon Baxter, DEQ's Office of Pollution Prevention, at (804) 698-4344 to get free non-regulatory assistance.